

JOHN W. HUBER, United States Attorney (#7226)
 MICHAEL GADD, Special Assistant United States Attorney (#13704)
 KENT A. BURGGRAAF, Special Assistant United States Attorney (#13044)
 VERNON G. STEJSKAL, Assistant United States Attorney (#8434)
 Attorneys for the United States of America
 111 South Main Street, Suite 1800
 Salt Lake City, Utah 84111
 Telephone: (801) 524-5682
 Email: michael.gadd@usdoj.gov

IN THE UNITED STATES DISTRICT COURT
 DISTRICT OF UTAH, CENTRAL DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

AARON MICHAEL SHAMO,

Defendant.

Case No. 2:16-cr-00631-DAK

MOTION FOR RESTITUTION AND
 JOINT REQUEST FOR A RESTITUTION
 HEARING POST SENTENCING

Judge Dale A. Kimball

The United States moves the Court to enter the restitution amounts, below, as part of its Judgment. The defendant owes the following amounts as restitution to the following victims and/or victims' representatives:

Amount	Victim/Representative	Purpose
\$24,625.00	T. K.	Funeral and related expenses for G.K., lost income
\$29,698.57	L.V.	Educational costs borne by parents due to death of C.V. (alt: lost income of C.V.)
12,724.32	J. L.	Damages at Titian Way house not covered by insurance
\$47,226.08	United Insurance Group	Insured damages at Titian Way house
\$18,193.00	R. R.	Damage personal property at Titian Way house
TOTAL: \$132,466.97		

Because the defendant contests these restitution amounts, the parties jointly request that the Court set a hearing within ninety days¹ from the defendant's sentencing hearing for the United States to proffer documentation in support of the restitution amounts and provide argument that the restitution should be ordered.

Respectfully submitted this 12th day of October, 2020.

JOHN W. HUBER
United States Attorney

/s/ Michael Gadd
MICHAEL GADD
Special Assistant United States Attorney

¹ 18 U.S.C. 3664(d)(5) states, in pertinent part: "If the victim's losses are not ascertainable by the date that is 10 days prior to sentencing, . . . the court shall set a date for the final determination of the victim's losses, not to exceed 90 days after sentencing." Because the restitution amounts are in dispute, the United States will attempt to gather additional documentation in support of the requests of the victims.